

## Part 2

### Field Harvest and Field Packing Activities

This part relates to harvesting commodities and packing them in the field. The emphasis is on worker sanitation and harvesting activities. Harvesting equipment should be cleaned regularly. Packing equipment that comes into contact with the product should be as clean as possible.

**2-1** A documented pre-harvest assessment is made on the crop production areas. Risks and possible sources of crop contamination are noted and assessed.

**Document required**

A pre-harvest assessment must be carried out prior to harvest. This assessment helps the grower evaluate the field to be harvested and materials needed for harvest (See *Pre-Harvest Assessment Log*). When it is a perennial or multi-harvest crop, a pre-harvest assessment should be carried out weekly or just before each harvest.

### Field Sanitation and Hygiene

**2-2** The number, condition, and placement of field sanitation units comply with applicable state and/or federal regulations.

**Auditor Observation**

Management must ensure that employees in the field take the necessary precautions to avoid microbial contamination of the produce. Growers should make sure that all state and Federal Occupational Safety and Health Administration (OSHA) and Federal Worker Protection Standards (WPS) requirements are reviewed with supervisors to ensure that the proper number of toilet and handwashing (1 per every 20 workers) facilities are available in the field. A portable toilet must be within ¼ mile or 5 minute walking time. Under New Jersey regulations, a toilet and handwashing facility must be available within 500 ft. travel distance or 5 minute walking time or within five minute

travel time by approved transportation provided by the farm operator. Toilet facilities shall be separate for each sex with 1 seat for every 1-20 males and 1 seat for every 1-20 females.

**2-3** When question 2-2 is answered “N/A” (sanitation units are not required), a toilet facility is readily available for all workers.

**Auditor Observation**

Even if field sanitations units are not required, a toilet facility must be available for all workers at a reasonable distance!

Worker sanitation and hygiene is one of the main potential sources of produce contamination. This must be stressed to workers on a regular basis through training and observation. The use of gloves does not take the place of handwashing! If gloves are used, hands should be washed prior to wearing gloves (See *Washing away misconceptions about gloves and handwashing*). Signs should be posted in the appropriate language for employees informing them to wash their hands after use of the toilet (See *Please wash your hands often!*). The hand washing stations must be placed outside the toilets so workers can be observed using them.

Portable toilets must be supplied and maintained on a regular maintenance schedule and documentation is required for this activity (See *Restroom & toilet facility maintenance log*). All field handwashing facilities must include potable water for handwashing, soap and single-use paper towels. Hand sanitizers are not a substitute for handwashing.

**2-4** Field sanitation units are located in a location that minimizes the potential risk for product contamination and are directly accessible for servicing.

**Auditor Observation**

The field toilets should not be located in the field that is being harvested or near product already harvested or packed. Workers must be encouraged to use field toilets and to use them properly. Used toilet paper tissue cannot be placed in a box or other receptacle in the facility it must be put in the holding tank of the toilet. **Used toilet tissue that is disposed of on the floor or in a box will cause an unsanitary condition and will cause the audit to fail.** Signs should be placed outside and inside the toilet facility to encourage proper use, (*See Please use toilets provided in the field and Please put used toilet paper in the toilet*).

**2-5** A response plan is in place for the event of a major spill or leak of field sanitation units or toilet facilities.

**Policy/standard operating procedure required**

Include a written procedure in the Grower Food Safety Plan about how to contain spills should one occur. **Example: The service company is immediately called and a dirt barrier is constructed around the spill.**

### **Field Harvesting and Transportation**

This section relates to the use of harvest trays, tables, baskets, totes, bulk hauling vehicles or other harvesting containers used during the process of harvesting.

**2-6** All harvesting containers and bulk hauling vehicles that come in direct contact with product are cleaned and/or sanitized on a scheduled basis and kept as clean as practicable.

**Document required**

Reusable harvest trays, totes, bins, etc. should be cleaned and/or sanitized appropriately, in a timely manner, and documented in the Grower Food Safety Plan. If the containers are stored outside, they should be sanitized before reuse. Packing containers that are damaged or soiled and no longer repairable or cleanable should be discarded in an effort to reduce microbial contamination. All fields packing requires the use of new or sanitized containers (See *Harvesting container sanitization log*) that have been stored properly. Each container must have an identifiable label or writing to enable traceability. This can be accomplished with a label gun or writing on the container.

**2-7** All hand harvesting equipment and implements (knives, pruners, machetes, etc.) are kept as clean as practical and are disinfected on a scheduled basis.

**Document required**

Field equipment should be cleaned as needed. This includes hand-harvesting equipment (knives, pruners, machetes, etc.) which must be cleaned and sanitized (See *Knife Cleaning Log and Field harvesting equipment and transportation sanitization log*) on a scheduled basis. That schedule for the equipment, including hand-harvesting materials, must be included in the food safety plan. **For example – Field knives are cleaned and disinfected at the end of each day by washing then placing in a container of bleach for at least 20 minutes.** Water that is applied to wash and clean equipment must be microbially safe.

**2-8** Damaged containers are properly repaired or disposed of.

**Auditor Observation**

Any bins, totes, boxes, etc. must be properly repaired or discarded. If pallets or bins need to be repaired, designate a location for holding and repairs. Damaged containers are prime locations for rodents to hide.

**2-9** Harvesting equipment and/or machinery which comes into contact with product is in good repair.

**Auditor Observation**

Growers should inspect their equipment for leaking fluids or loose and damaged parts that could be a source of physical contamination.

**2-10** Light bulbs and glass on harvesting equipment are protected so as not to contaminate produce or fields in the case of breakage.

**Auditor Observation**

When using harvesting equipment, the lights and any glass surfaces must be protected so produce does not become contaminated in case of breakage. This can be accomplished with shatter proof bulbs or covers.

**2-11** There is a standard operating procedure or instructions on what measures should be taken in the case of glass/plastic breakage and possible contamination during harvesting operations.

**Policy/standard operating procedure required**

If something does become contaminated the harvest crew should have instructions on how to proceed. **For example – If there is glass/plastic breakage in the field, the contaminated area will not be harvested within five feet and any produce that had been harvested from the area will be placed in plastic bags and removed from the field.** This statement needs to be in your food safety plan.

**2-12** There is a standard operating procedure or instructions on what measures should be taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors

**Policy/standard operating procedure required**

A similar procedure and statement is needed in case of contamination by chemicals, petroleum products, pesticides. With chemical or pesticide spills, the non-harvest area may need to be expanded. The supervisor or owner needs to determine the total that would need to be destroyed. Develop a clear, concise plan on how to proceed that is understood by everyone.

**2-13** For mechanically harvested product, measures are taken during harvest to inspect for and remove foreign objects such as glass, metal, rocks, or other dangerous/toxic items.

**Auditor Observation**

For mechanically harvested crops, devise methods to inhibit or remove foreign objects such as glass, metal, rocks, etc. If along a road, this may be part of a pre-harvest

assessment where a worker walks the field edges to remove trash. Equipment adjustment may be necessary in some cases.

**2-14** Harvesting containers, totes, etc. are not used for carrying or storing non-produce items during the harvest season, and farm workers are instructed in this policy.

**Policy/standard operating procedure required**

When harvesting, workers should not stand inside bins or carry personal food items or other non-produce items in the harvesting containers. Include a statement in the food safety plan that workers are prohibited from using harvesting containers for carrying or storing non-produce items during the harvest season and enforce the rule. If a container is to be used for other purposes, write on the side of the container “Not for harvest” or “Do not use for harvesting”.

**2-15** Water applied to harvested product is microbially safe.

**Record required**

If using water during field harvest, the water must be tested to make sure it is microbially safe which means non-detectable generic E. coli. The best source is municipal water followed by ground water (wells). The municipal water does not need to be tested, but the ground water should be tested once per year.

**2-16** Efforts have been made to remove excessive dirt and mud from product and/or containers during harvest.

**Auditor Observation**

Care must be taken to remove excess dirt or protect field packed produce from contamination because of possible exposure to manure and animal fecal material in the soil. Placing another container under the harvest container or stacking on pallets will

help reduce contamination. Some growers may want to consider using harvest aids to keep produce off the ground.

**2-17** Transportation equipment used to move product from field to storage areas or storage areas to processing plant which comes into contact with product is clean and in good repair.

**Auditor Observation**

Wagons or trailers used to transport produce from the field must be inspected for cleanliness, odors, dirt or debris before beginning the loading process. Produce should be loaded in a manner to minimize damage to the product (See *Field harvest & field packing inspecting*). Any equipment used to haul garbage, manure, or other debris should not be used to haul fresh produce or contact containers or pallets that are used to haul fresh produce without first being carefully cleaned and sanitized.

**2-18** There is a policy in place and has been implemented that harvested product being moved from field to storage areas or processing plants are covered during transportation.

**Policy/standard operating procedure required**

Products packed in the field should be protected (covered) when being moved to the storage or processing area. Tarping or using enclosed trailers will reduce the chance of contamination from birds and dust. When the product is unloaded at the storage area it should be done under a roof or tarp cover (not mesh cover). Include in the food safety plan a statement about covering produce during transport if a covering system is used.



**2-19** In ranch or field pack operations, only new or sanitized containers are used for packing this product.

**Document required**

New containers are the best way to reduce the chance of contamination if stored properly. Reusable containers (RPC's) must be cleaned and sanitized prior to use either at the farm or RPC management company. A cleaning log or record is required. If containers are clean, single use plastic liners can take the place of a sanitation step if the container cannot be sanitized, i.e. cardboard.

**2-20** Packing materials used in ranch or field pack operations are properly stored and protected from contamination.

**Auditor Observation**

If packing material is not being used, it must be protected from contamination. This can be done by storing in a building or if outside, cover the material with plastic tarps. The need is to keep birds, rodents and other animals off the packing material. Using the top container in a stack for a cover is not sufficient.

**2-21** Product moving out of the field is uniquely identified to enable traceability in the event of a recall.

**Document required**

Each load moving from the field should have a "trip ticket" that lists at a minimum: harvest date, field number and number of containers, i.e.: baskets, bins, boxes, etc. This ticket is passed to the receiver of the product upon delivery.